

Elizabeth J. Cabraser (State Bar No. 83151)
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008
Email: ecabraser@lchb.com

Plaintiffs' Lead Counsel

Robert J. Giuffra, Jr.
William B. Monahan
Darrell S. Cafasso
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
Email: giuffrar@sullcrom.com
Email: monahanw@sullcrom.com
Email: cafassod@sullcrom.com

*Counsel for Fiat Chrysler Automobiles N.V.,
FCA US LLC, Sergio Marchionne, VM Motori,
S.p.A., and VM North America, Inc.*

Matthew D. Slater
Cleary Gottlieb Steen & Hamilton LLP
2000 Pennsylvania Ave., N.W.
Washington, DC 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1999
mslater@cgsh.com

*Counsel for Robert Bosch LLC and Robert
Bosch GmbH*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CHRYSLER-DODGE-JEEP
ECODIESEL MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 3:17-md-02777-EMC

**STIPULATION AND ~~PROPOSED~~^{modified}
ORDER TO ADJUST BRIEFING
SCHEDULE FOR CLASS PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

The Honorable Edward M. Chen

1 WHEREAS, under the current schedule (Dkt. 300), the oppositions of Defendants
2 Fiat Chrysler Automobiles N.V., FCA US LLC, Sergio Marchionne, VM Motori S.p.A., and VM
3 North America, Inc. (together, the "FCA Defendants") and Robert Bosch GmbH and Robert
4 Bosch LLC (together, the "Bosch Defendants") (collectively, "Defendants") to Class Plaintiffs'
5 Motion for Class Certification (the "Motion") are due on July 23, 2018, and Class Plaintiffs' reply
6 brief in support of their Motion is due on August 20, 2018;

7 WHEREAS, on June 6, 2018, Class Plaintiffs filed their Motion and attached three
8 expert declarations, as well as one expert report authored by Steven P. Gaskin;

9 WHEREAS, on June 8, 2018, Defendants wrote to Class Plaintiffs to request that
10 they produce, among other things, the input files and software programs used in Mr. Gaskin's
11 analysis, which Defendants contended were needed to fully replicate Mr. Gaskin's results;

12 WHEREAS, on June 13 and 14, 2018, Class Plaintiffs produced facts and data
13 considered by Mr. Gaskin and their other experts, which Plaintiffs maintain included all facts and
14 data considered by Mr. Gaskin and necessary to replicate Mr. Gaskin's analysis in his June 6
15 report;

16 WHEREAS, Defendants' experts studied the facts and data produced by Class
17 Plaintiffs and report that they were unable to replicate Mr. Gaskin's analysis in his June 6 report,
18 and as a result, through June 22, the parties exchanged several emails concerning information
19 related to Mr. Gaskin's report that Defendants believed had not yet been produced;

20 WHEREAS, the Parties met and conferred by phone on June 11 and June 22 in an
21 attempt to resolve their dispute;

22 WHEREAS, on June 19, at the request of Defendants, Class Plaintiffs created and
23 produced an additional "Data Glossary for Sawtooth," which described certain terms used in a
24 computer program used in Mr. Gaskin's analysis;

25 WHEREAS, on June 24, 2018, Plaintiffs permitted Defendants' experts to
26 question Mr. Gaskin for approximately an hour to resolve issues raised by Defendants regarding
27 the replication of Mr. Gaskin's analysis in his June 6 report;

28 WHEREAS, as a result of the Parties' numerous meet and confers, culminating on

1 June 24, 2018, and Defendants' belief that Defendants did not have the information necessary to
2 replicate Mr. Gaskin's analysis until Class Plaintiffs provided certain information to Defendants
3 on the June 24, 2018 meet-and-confer, the Parties have agreed (i) to extend the time for
4 Defendants to file their oppositions to Class Plaintiffs' Motion for Class Certification until
5 August 6, 2018, and (ii) to extend the deadline for Class Plaintiffs' reply brief in support of their
6 Motion to September 3, 2018; and

7 WHEREAS, the Parties do not seek a continuance of the hearing date scheduled
8 for September 17, 2018.

9 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
10 among the Parties hereto, through their undersigned counsel, and subject to the Court's approval,
11 that (i) Defendants shall file their oppositions to Class Plaintiffs' Motion for Class Certification
12 by August 6, 2018, and (ii) Class Plaintiffs shall file their reply brief in support of their Motion by
13 September 3, 2018.

14 **SO STIPULATED.**

15 Dated: June 27, 2018

Respectfully submitted,

16 SULLIVAN & CROMWELL LLP

17 By: /s/ Robert J. Giuffra, Jr.
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21 Darrell S. Cafasso
22 Sullivan & Cromwell LLP
23 125 Broad Street
24 New York, New York 10004
25 Telephone: (212) 558-4000
26 Facsimile: (212) 558-3588
27 giuffrar@sullcrom.com
28 monahanw@sullcrom.com
cafassod@sullcrom.com

*Counsel for Fiat Chrysler Automobiles N.V., FCA US LLC,
Sergio Marchionne, VM Motori, S.p.A., and VM North
America, Inc.*

1 Dated: June 27, 2018

CLEARY GOTTLIEB STEEN & HAMILTON LLP

2 By: /s/ Matthew D. Slater
Matthew D. Slater

3
4 Cleary Gottlieb Steen & Hamilton LLP
2000 Pennsylvania Ave., N.W.
Washington, DC 20006
5 Telephone: (202) 974-1500
6 Facsimile: (202) 974-1999
mslater@cgsh.com

7 *Counsel for Robert Bosch LLC and Robert Bosch GmbH*

8 Dated: June 27, 2018

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

9
10 By: /s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

11 Lieff Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
12 San Francisco, CA 94111-3339
Telephone: (415) 956-1000
13 Facsimile: (415) 956-1008
ecabraser@lchb.com

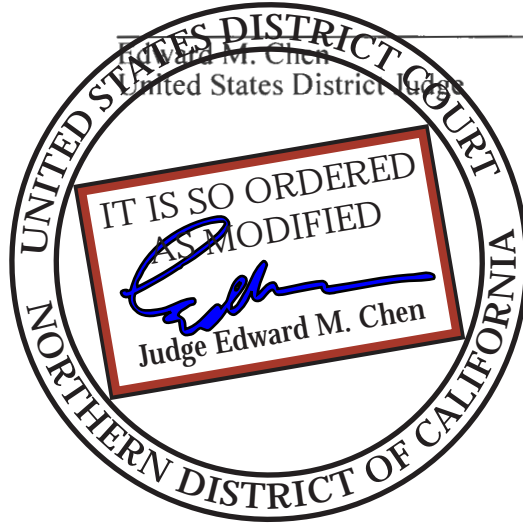
14 *Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering*
15 *Committee*

**[PROPOSED] ORDER ADJUSTING BRIEFING SCHEDULE FOR CLASS
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Based on the foregoing Stipulation, the Court GRANTS the Parties' Stipulation to Adjust
Briefing Schedule for Class Plaintiffs' Motion for Class Certification. Motion hearing reset

IT IS SO ORDERED. from 9/17/18 to 9/28/18 at 10:00 a.m.

DATED: 6/28, 2018.



ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories.

Dated: June 27, 2018

/s/ Michael P. Devlin
Michael P. Devlin

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 27, 2018, a true and correct copy of the foregoing was electronically filed and served electronically via the Court's CM/ECF system, which will automatically serve notice to all registered counsel of record.

/s/ Michael P. Devlin
Michael P. Devlin